

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Edward V. Weis	:	Chapter 13
	:	No.: 20-11161-MDC
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PENNYMAC LOAN SERVICES, LLC.

Debtor, Edward V. Weis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Pennymac Loan Services, LLC. hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted some payments were missed.
5. Admitted some payments were missed. Debtor suffered a temporary reduction in income that lasted roughly four months. Debtor's income has since resumed and he is asking for the chance to catch up.
6. Debtor is unsure of the total amount owed and is requesting Movant's post-petition accounting in order to properly plan to catch up.
7. Debtor opposes the same.
8. Denied. Debtor's income has resumed and he is asking for the chance to catch up.
9. No objection.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: July 28, 2021

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Lauren M. Moyer
Attorney for Movant
Electronic Notice to *ecfmail@mwc-law.com*

Dated: July 28, 2021

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107